

Minnesota Pollution Control Agency

March 15, 1988

Mr. Richard Clute
WCI Freezer Division
701 North 33rd Avenue
St. Cloud, Minnesota 56303

Dear Mr. Clute:

RE: Approval of Hazardous Waste Facility Closure Plan For Storage Facility
MND092304856

This constitutes a letter of approval for the closure plan submitted earlier to the Minnesota Pollution Control Agency for closure of the facility referenced above. No comments were received during the public comment period. Therefore, the plan as submitted on January 20, 1988 is approved.

At this time steps should be taken to close the facility according to the plan and within the time frame as outlined. When closure is completed, then the certification as required in Minn. Rules pt. 7045.0488 must be submitted to the following address:

Minnesota Pollution Control Agency
Hazardous Waste Division
Permits and Review Unit
520 Lafayette Road
St. Paul, Minnesota 55155
Attention: Steven A. Reed, P.E.

This certification, by the owner or operator and by an independent registered professional engineer, is that the facility has been closed in accordance with the specifications in the approved closure plan.

Phone: _____

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Mr. Richard Clute
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After closure activities have been completed, Kevin Veach from my staff will make arrangements to visit the site and verify satisfactory closure of the facility.

Please contact Kevin Veach at 612/296-8582 if you have any questions.

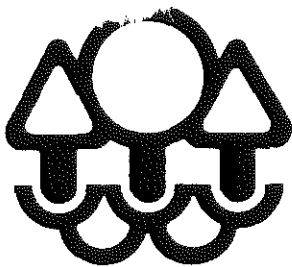
Sincerely,

A handwritten signature in cursive script, reading "Steven A. Reed".

Steven A. Reed, P.E., Supervisor
Permit and Review Unit
Hazardous Waste Section
Hazardous Waste Division

SAR/KV:cj

cc: Diane Bartelt, U.S. Environmental Protection Agency, Chicago
Charles Slaustus, U.S. Environmental Protection Agency, Chicago



Minnesota Pollution Control Agency

January 29, 1988

Mr. Dick Clute
WCI Freezer Division
701 North 33rd Avenue
St. Cloud, Minnesota 56302

Dear Mr. Clute:

Thank you for the submittal of the closure plan for the Resource Conservation and Recovery Act (RCRA) storage facility. As you discussed on the telephone with Kevin Veach, it meets the requirements of the Minnesota hazardous waste rules for facility closure with the following exceptions:

1. The description of closure activities on page 5 should include either plans to do wipe sampling of the storage areas to verify decontamination or plans to clean the floors with an appropriate cleaning compound to remove any waste residues.
2. The closure plan should state that the floors shall be inspected to determine if cracking or other damage to the containment system could have allowed hazardous waste to be released to the environment.
3. If the containment system is significantly damaged and releases occurred which may have reached the soil, then soil sampling must be done. A minimum of four borings would be required - one at the location of potential release and three surrounding it. Samples should be taken at the soil-concrete interface at 12 inches and at 24 inches below the concrete. Soil samples should be analyzed for the hazardous constituents of the wastes stored in that area. (If there is no damage to the containment system or no spills have occurred then borings would not be necessary.) Please include the above provisions in your closure plan.

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4. Section B on page 5 should state that cleanup residues will be labeled, packaged and managed as hazardous waste and will be disposed of at a permitted RCRA treatment storage or disposal facility. This is how you indicated that you wish to manage the cleanup wastes.
5. Finally, the closure time line on page 6 only needs to refer to the physical closure step and may state that physical closure will be completed within 15 days of the Minnesota Pollution Control Agency's (MPCA) approval of the closure plan.

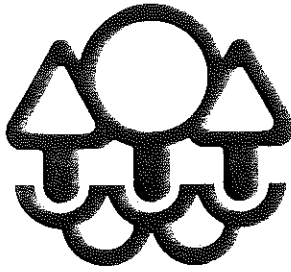
Please make the above listed revisions to the closure plan and submit them for receipt at the MPCA by February 5, 1988. Please call Kevin Veach at 612/296-8582, if you have any questions or comments on the closure plan.

Sincerely,


Steven A. Reed, P.E., Supervisor
Permit and Review Unit
Hazardous Waste Section
Hazardous Waste Division

SAR/KV:cj

cc: Charles Slaustas, U.S. Environmental Protection Agency, Chicago



Minnesota Pollution Control Agency

MND 092304 P56

January 7, 1988

Mr. Dick Clute
WCI Freezer Division
701 North 33rd Avenue
St. Cloud, Minnesota 56303

RECEIVED
JAN 12 1988

JAN 12 1988

CLUTE, DICK
ST. CLOUD, MINN.

Dear Mr. Clute:

RE: Closure of Hazardous Waste Storage Units

The Minnesota Pollution Control Agency (MPCA) has reviewed the closure materials submitted previously and requests several changes in the closure plan in order to begin the closure process for your facility. Our goal is to have a complete and acceptable closure plan and to begin the public comment period for this closure by January 30, 1988.

In order to be approvable the closure plan must meet all the requirements of Minn. Rules pts. 7045.0594, 7045.0596 and 7045.0626, subp. 8. Although the regulated units will continue to be used under generator status these units must be closed in a manner constituting clean closure, i.e. all contaminated structures or equipment must be decontaminated or removed.

The closure plan shall be submitted as one complete and coherent document. The plan must include the following:

1. A description of the two areas to be closed and how they will be used after closure.
2. A description of the wastes stored and a maximum inventory of these wastes.
3. A description of the steps to remove or decontaminate all contaminated areas or structures in the storage units.
4. An estimate of the date of final closure of the storage units.
5. A timeline or schedule showing the time required for the closure steps.

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6. An updated description of the management of wastes generated by the closure.
7. An updated closure cost estimate based on disposal of a maximum inventory of stored wastes.

After we receive a complete, acceptable closure plan, the MPCA will begin a 30 day public comment period. Following this, the MPCA will respond to public comments and approve or if necessary modify the closure plan. After the closure actions are completed the closed units must be inspected by a registered professional engineer who will certify the closure.

Please be aware that the corrective action investigation for your facility will continue independently of the closure of these two regulated units. Please submit your closure plan to the MPCA by Thursday, January 21, 1988. If you have any questions please call Kevin Veach at 612/296-8582.

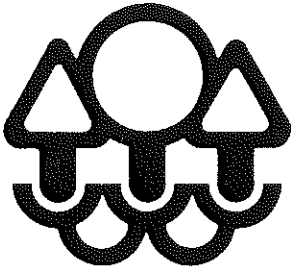
Sincerely,



Steven A. Reed, P.E., Supervisor
Hazardous Waste Permit and Review Unit
Hazardous Waste Section
Hazardous Waste Division

SAR:KV:cv

cc: Charles Slaustas, U.S. Environmental Protection Agency, Chicago



REC'D SEP 8 1986

Minnesota Pollution Control Agency

Mr. Richard Clute
Franklin Manufacturing Company
701 - 33rd Avenue North
St. Cloud, Minnesota 56301

Dear Mr. Clute:

Re: Hazardous Waste Storage Facility Closure

Although the information on closure of the in-building hazardous waste storage areas appears mostly complete, problems remain with respect to the old waste disposal lagoon. As you were notified in the July 2, 1985 letter signed by Fred Jenness, in order to receive final closure approval, corrective action must be provided for releases from all on-site solid waste management units, as required in the Minnesota Solid Waste Act of 1984. The former waste lagoon qualifies as such a unit.

Based on the information in the Agency's files, we do not have sufficient information on the abandoned lagoon. The following is a list of the relevant documents that we have which provide information on the waste lagoon.

1. "Additional Soils Investigation" Braun Engineering, August 29, 1979.
2. "Leach Test for Chromium" Pace Labs, October 16, 1976.
3. Parts of the Pace Labs Chromium tests, September 12, 1979.
4. Letter from Sanitary Landfill, Inc. requesting permission to stockpile "settling pond excavation material" October 23, 1979.
5. Letter from Minnesota Pollution Control Agency (MPCA) approving disposal of 2000 cu. yards of settling pond material, at Sanitary Landfill, Inc. October 30, 1979.
6. Note card stating lagoon abandoned August 1979, previously received 52,000 GPD paint wash water and phosphatizer. Size: 200' maximum diameter, 40' minimum, signed Warren Hull. No date.
7. Two complaints received in 1985 mentioning a "landfill" on the Franklin Manufacturing property which may have received hazardous wastes including waste in drums.
8. "Potential Hazardous Waste Site Preliminary Assessment" from MPCA claiming potential of surface and groundwater contamination, August 15, 1985.
9. "Certification Regarding Potential Releases" by Franklin, September 3, 1985
10. "Letter from MPCA stating requirement of corrective action on all solid waste management units, prior to closure approval July 2, 1985.

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Mr. Richard Clute
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The only chemical analysis which we have is the 1979 Pace Labs analysis for chromium. Given the large number of wastes generated and the long use period of the lagoon, it is necessary to address the possibility of releases from the lagoon. Therefore please submit to the MPCA any of the following information which you have:

1. Any chemical analyses of soil/groundwater from the area under or near the waste lagoon, excepting the chromium analysis.
2. Any records which indicate prior disposal of hazardous wastes in the lagoon and/or landfill.
3. Records which indicate the depths to which chromium contaminated soil was removed for the warehouse construction.

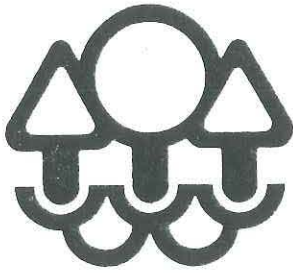
For your information, a RCRA facility assessment (RFA) will be performed on your facility by a U.S. EPA contractor. The purpose of the RFA is to make a decision on the need for a remedial investigation at the facility. You will be contacted soon regarding this matter.

Please send us your response within 30 days. If you have any questions or if we can be of any assistance please feel free to contact Kevin Veach and 612/297-1794.

Sincerely,

Steven A. Reed, P.E., Supervisor
Hazardous Waste Permit and Review Unit
Hazardous Waste Section
Solid and Hazardous Waste Division

SAR/ds



Minnesota Pollution Control Agency

July 15, 1988

Mr. Richard Clute
WCI Freezer Division
701 33rd Avenue North
St. Cloud, Minnesota 56301

Dear Mr. Clute:

On Tuesday, June 7, 1988, I inspected your facility in order to approve the closure of the two hazardous waste storage areas. Thank you for the time you took to show me the facility and explain some unfamiliar aspects of your waste management. All containers of hazardous waste were properly stored and labeled and within the 90 day storage time period. The ignitables storage area was properly cleaned as was the nonignitables area within the chain link cage. However, the other areas which stored nonignitable hazardous waste had not been decontaminated. The area which formerly held methylene chloride foam-flush drums, the storage area outside the cage door and around and in the floor drain needed to be decontaminated as described in the closure plan, before the MPCA could approve your closure actions. Based on your letter of June 21, 1988, we understand that this action has been completed. Because all of closure actions were completed by June 30, 1988, WCI Freezer Division should not be assessed with the annual facility fee for 1988. This letter will be followed by one which approves closure, and grants WCI Freezer Division a return to generator status.

During the inspection we discussed sealing the floor joints. This would help assure an impervious surface as required in the hazardous waste generator rules. Please complete sealing of the floor joints in the two hazardous waste storage areas by August 1, 1988, and inform the MPCA when this has been done.

If you have any questions, please call me at 612/296-8592.

Sincerely,

Kevin Veach

Kevin Veach
Permits and Review Unit
Hazardous Waste Section
Hazardous Waste Division

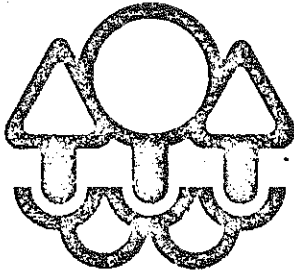
KV:jcj

cc: Charles Slaustas, EPA ✓

Phone: _____

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SAR/TBT



Minnesota Pollution Control Agency

July 2, 1985

Mr. Richard B. Clute
Supervisor, Environmental Engineering
Franklin Manufacturing Company
701 33rd Avenue North
St. Cloud, Minnesota 56301

Dear Mr. Clute:

Re: Corrective Action/Closure
Franklin Manufacturing Company
EPA ID Number MND092304856

As you are aware, we are currently evaluating your request for closure of the facility referenced above which is regulated under the Resource Conservation and Recovery Act (RCRA) and Minnesota hazardous waste rules.

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 were enacted to amend RCRA. Under Section 206 and Section 233 of these amendments (copy enclosed), all facilities "seeking a permit" (taken to include interim status facilities) must provide for corrective action for all releases of hazardous waste or constituents from any solid waste management unit. Please note that both hazardous and nonhazardous waste can meet the definition of solid waste under 40 CFR 261.2. At the Environmental Protection Agency's (EPA) request, the Minnesota Pollution Control Agency (MPCA) is collecting the information addressing these requirements during the closure review process.

EPA will use this information in determining if a release has occurred at the facility site. Where releases have occurred, measures must be taken to ensure that corrective actions either have been taken, or will be taken, prior to a decision on your closure plan. An important part of this determination depends upon your willingness (or unwillingness) to sign the enclosed certification statement. Please read it carefully, and either sign it and return it, or return it to us unsigned with a cover letter of explanation within three weeks of the date of this letter. The public notice regarding closure of your facility will

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Mr. Richard B. Clute
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indicate that you have submitted the certification regarding releases. In addition, it will include a request for the public to provide information regarding releases of hazardous waste or hazardous constituents at the facility or solid waste management units. The public notice will be in a newspaper of general circulation in the area of the facility.

Please call Thomas B. Townsend of my staff at 612/297-1785 if you have any questions, or wish to discuss this further.

Sincerely,

Frederick M. Jenness for

Steven A. Reed, P.E., Supervisor
Hazardous Waste Permit and Review Unit
Regulatory Compliance Section
Solid and Hazardous Waste Division

SAR/TBT:dmc

Enclosure

cc: David A. Stringham, EPA, Chicago
Joel Morbito, EPA, Chicago

RECEIVED

JUN 13 1985

SWB-AIS
U.S. EPA, REGION V

June 6, 1985

RCRA Activities
Part B Permit Application
U.S. EPA, Region V
P. O. Box A3587
Chicago, IL 60690-3587
Attn: 5HS-13

Mr. Karl J. Klepitsch, Jr., *MND092304856 CTR, TSD, PA*

This letter is to advise you that we have initiated facility closure with the Minnesota Pollution Control Agency (MPCA) in lieu of submittal of Part B of the Facility Permit Application.

Enclosed is a copy of the correspondence to the MPCA initiating facility closure. By means of this letter we are notifying you of our intent to complete closure under the direction of the MPCA.

Please notify us directly if further correspondence is required with your agency on this matter.

Sincerely,



W. L. Hull
Vice President, Manufacturing

WLH/jmj

Attachments

FRANKLIN
MANUFACTURING COMPANY

701 33RD AVENUE N.
ST CLOUD, MINNESOTA 56301-2340



RCRA Activities
Part B Permit Application
U.S. EPA, Region V
P. O. Box A3587
Chicago, IL 60690-3587
Attn: 5HS-13

Mr. Karl J. Klepitsch, Jr.,

FRANKLIN
MANUFACTURING COMPANY

A Division of
White Consolidated Industries, Inc.
WCI

May 23, 1985

Minnesota Pollution Control Agency
1935 County Road B2
Roseville, MN. 55113-2785

Attention: Mr. Tom Townsend

RE: Hazardous Waste Storage Facility Closure

Tom,

We are currently taking the necessary steps to close our hazardous waste storage facility and become a hazardous waste generator only.

We are currently repacking waste into containers that are acceptable for direct incineration. The repackaged wastes will be shipped to Rollins Environmental Services (LA), Inc. for incineration.

The off-site shipment of all wastes over 90 days old and a clean-up of the hold area will complete the physical closure activities.

Enclosed is a copy of our facility closure plan and cost estimates.

I will appreciate notification, prior to publication, of the Public Notice of Closure.

Let me know if you have any additional questions, or comments, on the information supplied.



Richard B. Clute
Supervisor, Environmental Engineering

RBC/mjm

enc.

HAZARDOUS WASTE STORAGE FACILITY
CLOSURE PLAN
REF: 40 CFR PART 265.112

Franklin Manufacturing Company only stores wastes generated on site and does not accept wastes from other generators. Facility equipment used for the storage of hazardous wastes consists of 55 gallon drums. The wastes are stored in designated areas prior to shipment off-site for treatment or disposal. During closure, decontamination of facility equipment will be accomplished by shipping remaining wastes from the site.

See closure cost estimates for type and quantity of wastes stored, disposal location and cost of disposal.

FRANKLIN MANUFACTURING COMPANY
HAZARDOUS WASTE DISPOSAL FACILITY
CLOSURE COST ESTIMATED
REF: 40 CFR 265.142

<u>Type of Waste</u>	<u>Quantity Stored (Maximum)</u>	<u>Storage Location</u>	<u>Disposal Facility</u>	<u>Disposal Cost</u>	<u>Remarks</u>
Paint Solvent	2,000 gal	Flammable	Solv-Oil Service	\$1,300.00 \$(35.00/drum)	
Cleaning Solvent	300 gal	Flammable	Waste Research & Reclamation	600.00 (100.00/drum)	
Foam Flush	4,000 gal	NonFlammable	Waste Research & Reclamation	2,600.00 (35.00/drum)	
Mold Stripper	330 gal	NonFlammable	Waste Research & Reclamation	480.00 (80.00/drum)	
Waste Resin	400 gal	NonFlammable	Rollins Environmental Services (LA), Inc.	2,100.00 (105.00/20 gal. drum)	Intermittent Waste Stream-Quantity Stored is an Estimate of Possible Quantity at Closure
Waste TDI	200 gal	NonFlammable	Rollins Environmental Services (LA), Inc.	1,450.00 (145.00/20 gal. drum)	See Note on Waste Resin
Waste MDI	200 gal	NonFlammable	Rollins Environmental Services (LA), Inc.	1,208.00 (302.00/drum)	See note on Waste Resin

Phone Conversation Record

COPIES TO:

<input type="checkbox"/>	_____
<input type="checkbox"/>	_____
<input type="checkbox"/>	_____
<input type="checkbox"/>	_____
<input type="checkbox"/>	_____
<input type="checkbox"/>	_____
<input type="checkbox"/>	_____

Date 6/4/85 Time 10:30

Call Made ✓ Call Received _____

Conversed with Richard Clute

Phone No 612 253 1212

of Franklin Mfg

Project Franklin Mfg closure

Discussed from closure checklist, question of Hw facility storage capacity.
Clute estimates 30 drums flammable, 400 drums nonflammable
(1650 gal, 22000 gal) in the two storage areas. Part A application from 1980
of 29,700 gal included storage capacity for paint sludges, which are no
longer classified as Hw.

Action Required none

By: Thomas B Townsend

Closure Plan Checklist

Facility Name FRANKLIN MANUFACTURING

Facility Address 701 33RD AVENUE NORTH, ST CLOUD 56301

Facility EPA ID # MND 092 304 856

Name and address of company that owns the facility, if different from above _____

WHITE CONSOLIDATED INDUSTRIES, CLEVELAND, OHIO

Type of plan: Closure ☒ Partial Closure _____

Date Closure Plans Submitted 5/23/85

Expected Date Closure Completed _____

Type of Firm's Business MANUFACTURER OF HOUSEHOLD FREEZERS

Type and amount of hazardous waste involved in closure 2000 GAL PAINT SOLVENT,

300 GAL CLEANING SOLVENT, 4000 GAL FOAM FLUSH, 330 GAL MOLD STRIPPER, 400 GAL

WASTE RESIN, 200 GAL WASTE TOLUENE DIISOCYANATE,

200 GAL DIPHENYL METHANE DIISOCYANATE

Waste Capacity of Facility 23,650 GAL

Brief Description of Proposed Method for Closure WASTES TO BE SHIPPED

TO A HAZARDOUS WASTE INCINERATOR (ROLLINS, LOUISIANA)

After Closure, hazardous wastes will ☒ will not _____ remain on-site. ^{FOR LESS THAN 90 DAYS}

Closure plan will _____ will not ☒ be available for public review ^{AFTER GENERATION.}
during public comment period at facility's plant office.

Technical Reviewer's Name THOMAS B TOWNSEND

* Note: Be sure to include a copy of closure plan.

FRANKLIN
MANUFACTURING COMPANY

A Division of
White Consolidated Industries, Inc.
3921

May 23, 1985

Minnesota Pollution Control Agency
1935 County Road B2
Roseville, MN. 55113-2785

Attention: Mr. Tom Townsend

RE: Hazardous Waste Storage Facility Closure

Tom,

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Enclosed is a copy of our facility closure plan and cost estimates.

I will appreciate notification, prior to publication, of the Public Notice of Closure.

Let me know if you have any additional questions, or comments, on the information supplied.



Richard B. Clute
Supervisor, Environmental Engineering

RBC/mjm

enc.

HAZARDOUS WASTE STORAGE FACILITY
CLOSURE PLAN
REF: 40 CFR PART 265.112

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See closure cost estimates for type and quantity of wastes stored, disposal location and cost of disposal.

FRANKLIN MANUFACTURING COMPANY
HAZARDOUS WASTE DISPOSAL FACILITY
CLOSURE COST ESTIMATED
REF: 40 CFR 265.142

<u>Type of Waste</u>	<u>Quantity Stored (Maximum)</u>	<u>Storage Location</u>	<u>Disposal Facility</u>	<u>Disposal Cost</u>	<u>Remarks</u>
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